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September 28, 1995

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of

Amendment of Part 95 of the  
Commission's Rules to  
Establish a very short distance  
two-way voice service

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95-102

WT Docket No: ~~95-105~~

COMMENTS ON NOTICE OF PROPOSED RULE MAKING

These comments are being submitted by the North Shore Emergency Association, 918 Yale Street, Wilmette, Illinois 60091, telephone number 708-679-4227.

1. Interest of Commenter.

The North Shore Emergency Association (NSEA) is a volunteer organization comprised of licensed GMRS operators. NSEA was founded in 1968 in the Northern suburbs of Chicago. The group began performing activities such as emergency monitoring of Citizen's Band Channel 9. We also began to provide volunteer two-way radio communications for other volunteer organizations. Our group's focus over the years has shifted from emergency monitoring of Citizen's Band and moved towards critical and emergency two-way communications activities. Some of these activities include event communications for the Multiple Sclerosis Society, the American Cancer Society, Chicago Marathon, the Lake County Marathon, and the Evanston Fourth of July Association. Much of this activity involves medical communications between field units relaying messages for doctors about treatment of injuries. NSEA also has a formal working relationship with the American Red Cross, Mid-America Chapter, to provide communications in times of disaster. All of these activities have been conducted on the General Mobile Radio Service by our individually licensed volunteers. Communications are conducted thru GMRS repeaters, direct communications on GMRS output frequencies (462 MHz) as well as GMRS interstitial frequencies depending on the range needed. All participants, of course, are personally licensed, and we have been successful in coordinating our activities with other personally licensees, including repeater owners and licensees. We are obligated to continue these activities without harmful interference from the newly proposed unlicensed Family Radio Service.

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We are pleased to have an opportunity to comment on this most important proposed amendment to the rules. As a volunteer entity comprised of individual GMRS licensees and users, NSEA is most concerned with some of the proposed changes in the rules.

## 2. Comments

We feel that the Commission should take a close look at the following points regarding this proposed new service. If not addressed, these proposed changes may cause harmful interference which would jeopardize lives in volunteer events and at disaster scenes.

### 95.627 FRS Unit Channel Frequencies

- a. We do not believe the unit channel number 8 thru 14 are acceptable. These are channels with frequencies transmitting closely adjacent to the 467 MHz repeater input frequencies. Many of these repeaters are located atop high buildings and are equipped with very effective gain antennas and highly sensitive receivers. We believe that transmission near these frequencies could cause harmful interference to repeater operations with no knowledge of the FRS operator and no way for the repeater operators or users to contact the interfering FRS user. Interference to licensed GMRS users engaged in activities such as those of NSEA cited previously in "Interests" could potentially be catastrophic. The activities of the proposed Family Radio Service listed in the Commission's NPRM, Section II, Discussion, Para. 7 & 8, indicate activities that would include low power FRS units at an event or a disaster scene where individual licensed GMRS volunteers may be operating and rendering assistance. The interference to NSEA's activities would be greatly impacted because of the wide area coverage of repeater systems.
- b. We contend that the proposed FRS transmitter must be constructed and maintained with a frequency tolerance of .00025%. It is imperative that the tightest stability techniques possible be used since this service proposes to operate between primary licensed GMRS channels. This is especially true in cases where, if the Commission allowed it, FRS transmissions would be made in the proposed channels number 8 thru 14 in the 467 MHz portion of this service. Transmissions in this area could potentially cause harmful interference to licensed GMRS repeater stations. Many of these repeater stations are atop tall buildings or have great antenna heights, have highly sensitive receivers, and use effective high gain antennas. Such interference would go unnoticed by the FRS user and would severely impact a

potentially wide area of coverage of GMRS repeater stations. Of course, the potential interference to NSEA's Event and Disaster Committees discussed above would be magnified because of the coverage of many repeaters.

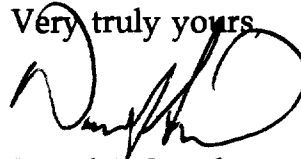
95.645 FRS Unit and R/C Transmitter Antennas

- a. We contend that the antenna for the proposed FRS unit must be specifically integral to the case of the finished radio. Any type of external antenna could be removed and a higher gain device could be connected violating the proposed Rules. We contend that there must be no type of exterior antenna connection which would violate the proposed Rules.

We as individual GMRS licensees and as an organization take our volunteer duties very seriously. The coordination of road assistance, property transportation logistics at events is a regular activity. The safety of lives is often our responsibility.

Please feel free to contact our organization with any questions that you might have regarding our interest or comments. I can be reached through our association's answering service at 708-679-4227 or at my office at 708-679-0300.

Very truly yours,



David J. Sniader  
Communications Committee  
North Shore Emergency Assn.

DJS/jk